

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

x : Case No. 1:21-cr-00478-ER
: **MOTION FOR EVIDENTIARY HEARING**
: **CONCERNING DEFICIENCIES IN THE**
: **GOVERNMENT'S FILTER**
: **TEAM PROTOCOL**
:
x

-against-

TREVOR MILTON,

Defendant.

Defendant Trevor Milton, through counsel, moves this Court, pursuant to Rule 12(b)(3)(C) of the Federal Rules of Criminal Procedure, to grant an evidentiary hearing to determine whether deficiencies in the filter team protocol used by the government to review and segregate privileged documents warrant the modification of the filter team protocol, the suppression of evidence, or some other appropriate remedy.

Defendant moves upon the Declaration of Robert S. Frenchman and its exhibits, and the accompanying Memorandum of Law.

Defendant respectfully requests oral argument on this matter.

Dated: December 15, 2021

Respectfully submitted,

/s/

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